

EXHIBIT A

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**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH**

CYNTHIA STELLA and the)	
ESTATE OF HEATHER MILLER,)	
)	DANIEL BACZYNSKI'S
Plaintiffs,)	DECLARATION RE:
)	MOTION FOR ATTORNEY'S
vs.)	FEES
)	
DAVIS COUNTY, et al.,)	Case No. 1:18-CV-002
)	
Defendants.)	Judge Jill Parrish
)	
)	
)	

I, Daniel Baczynski, declare:

1. I have personal knowledge of the facts set forth herein.
2. I submit this declaration in support of my clients' Motion for Attorney's Fees.
3. I graduated from the Loyola University Chicago School of Law in 2014. I first became licensed to practice law the same year. I am currently admitted to practice in Utah, Illinois, and North Dakota, as

well as the United States District Court for the District of Utah and North Dakota.

4. I am well versed in civil rights litigation. My practice primarily involves civil rights cases. Since moving to Utah in 2015, I have served as lead counsel on over forty civil rights cases including at least five appeals before the Tenth Circuit. Recently, most of my cases involving medical care provided in an incarcerated setting.
5. I have also litigated civil rights cases outside of Utah, including in Oregon and South Dakota.
6. I started Baczynski Law in 2017. I am the sole and managing attorney. While most of my cases are contingency fee cases, my current retainer agreements identify my hourly rate as \$400.
7. I have developed a reputation in the legal community for specializing in civil rights. Other attorneys refer civil rights cases to me for review. I have also assisted other attorneys in their review of potential civil rights cases.
8. I have also developed a reputation with local media as a specialist in medical care at Utah jails/prisons. I have been interviewed for stories unrelated to my cases regarding Utah jails/prisons and civil right violations.

9. I was hired by Cynthia Stella in the present case after she encountered difficulty in finding counsel to pursue her case. From my experience, this is not unusual. There are few attorneys in Utah who specialize and are willing to take civil rights cases. It is particularly difficult to find representation where the potential plaintiff was incarcerated. There is a belief among the legal community, both plaintiffs and defense counsel, that Utah juries will not compensate a “criminal”. The combination of a high standard of proof and a perceived low ceiling on damages makes these cases generally unattractive to counsel.
10. Cynthia Stella hired Mr. Draper and I to litigate the case. We hoped at the commencement of the case that we could litigate the matter in expedited fashion because we had the benefit of Attorney General’s Report. We did not anticipate the case would take near five years to get to trial.
11. This case has taken a great deal of counsels’ focus, time, and resources over its five-year duration. In the months leading up to our final trial date, Mr. Draper and I conversed near daily for hours about the best way to present the case. We did not deem all (or even most) of this time billable and so it does not appear on our invoices. I include this

statement to demonstrate how much time this case preoccupied, particularly in the lead up to trial.

12. Our invoices have been contemporaneously maintained. I have reviewed my invoices for unnecessary, irrelevant, and duplicative entries. I have removed entries which fit these categories. After totaling our hours, Mr. Draper and I have also removed an additional twenty-five hours each in further exercise of billing discretion.

13. Mr. Draper and I have advanced all costs and deferred all compensation pending the outcome of this matter.

14. I submit that the fees requested in the Motion and my time logs are reasonable and appropriate.

I declare under penalty of perjury in the State of Utah that the foregoing is true and correct.

Executed on October 5, 2022, in Utah.

/s/ Daniel Baczynski

Daniel Baczynski

Date	Description	Time
7/19/17	Call w/ Tad re: Case	0.5
7/26/17	Reviewing Client File - AG Report	1.9
7/26/17	Reviewing Client File - Jail Records	0.3
8/1/17	Reviewing Client File - Medical Records	0.6
8/1/17	Reviewing Client File - Weber County Report	1.1
8/2/17	Review Client File - EMS/ ME	0.8
8/4/17	Research on Deliberate Indifference Caselaw	3.6
8/7/17	Drafting Memo re: Viability of Case	2.8
8/8/17	Phone Call w/ Co-Counsel re: Viability of Case	0.8
8/20/17	Call w/ Co-Counsel re: Claims	0.6
8/21/17	Call w/ Co-Counsel re: Viability of Case	0.4
9/4/17	Call w/ Co-Counsel re: Available Claims	0.6
9/18/17	Research on State and Federal Constitutional Claims	3.3
9/20/17	Phone Call w/ Client	0.9
9/20/17	Email to Co-Counsel re: Claims and Utah Governmental Immunity Act	0.1
9/21/17	Email to Co-Counsel re: Claims and Utah Governmental Immunity Act	0.1
9/25/17	Research on Deliberate Indifference Caselaw	2.6
9/26/17	Research on UGIA and state claims	1.7
9/26/17	Call w/ Co-Counsel re: Deliberate Indifference	0.5
9/26/17	Drafting Summary	1.5
9/27/17	Reviewing Co-Counsel's Edits	0.2
10/2/17	Call w/ Tad re: Expert	0.4
10/9/17	Reviewing Email from Co-Counsel re: Excerpt of Jail Records	0.3
10/11/17	Reviewing Email from Client re: Excerpts of Jail Records	0.8
10/12/17	Compiling Summary for Potential Experts	1.3
10/16/17	Reviewing Co-Counsel's Email re: Experts	0.1
10/16/17	Reviewing Co-Counsel's Email w/ Todd Vinger	0.1
10/18/17	Review Records for Jail Standards for Vinger Review	0.3
10/18/17	Call w/ Tad re: Vinger Expert	0.6
10/19/17	Reviewing Co-Counsel's Email w/ Todd Vinger	0.2
10/23/17	Review Vinger's Draft Expert Opinion	0.5
10/25/17	Drafting Complaint	3.4
10/26/17	Research on 1983 Claims - Supervisor and Municipal Liability	2.8
10/26/17	Drafting Complaint	1.8
10/30/17	Reviewing Draper's Edits to Complaint	0.4
10/31/17	Email to Tad re: Damages Available	0.1
10/31/17	Email from Tad re: Party Defendants	0.1
10/31/17	Email to Tad re: Parties to Name as Defendants	0.1
10/31/17	Email from Tad re: Supervisor as Defendants	0.1
11/6/17	Call w/ Co-Counsel re: GRAMMA Request	0.7
11/7/17	Drafting GRAMMA Request to Davis County	0.4
11/7/17	Email to Vinger re: Documents Requested	0.1
11/7/17	Review Email from Vinger re: Docs	0.1
11/8/17	Emailed & Mailed GRAMMA Request to Davis County	0.1
11/8/17	Edits to Complaint	0.9
11/8/17	Call w/ Client re: Complaint	0.6
11/8/17	Email to Client re: Complaint	0.1
11/13/17	Email from Davis County re: GRAMMA Clarification	0.1

11/13/17 Email to Vinger re: Request to Clarify	0.1
11/15/17 Email to Davis County re: GRAMMA	0.1
11/15/17 Email from Davis County re: GRAMMA Clarification	0.1
11/21/17 Phone Call w/ Davis County re: GRAMMA	0.3
11/28/17 Email to Davis County re: Clarifying GRAMMA	0.6
11/28/17 Email to Client re: Medical Release Form	0.1
11/28/17 Phone Call w/ Client re: Medical Release Form	0.3
11/30/17 Email from Client re: Medical Release	0.1
11/30/17 Response to Client re: Release	0.1
12/1/17 Email to Davis County re: Medical Release	0.1
12/1/17 Email from Davis County re: GRAMMA Clarification	0.1
12/6/17 Email to Davis County re: GRAMMA Timeline	0.1
12/7/17 Email from Davis County re: GRAMMA Timeline	0.1
12/18/17 Edits to Complaint	0.8
1/2/18 Edits to Complaint	0.4
1/3/18 Filing Complaint	0.1
1/4/18 Drafting Summons to Defendants	0.4
1/4/18 Email to Clerk re: Summons	0.1
1/4/18 Email to Davis County Attorney re: Complaint	0.1
1/4/18 Email from DC Attorney re: Representation	0.1
1/4/18 Meeting with Client to discuss litigation strategy	3
1/5/18 Phone Call w/ Tad re: Appointed Judge	0.5
1/5/18 Phone Call w/ Client re: Appointed Judge	0.4
1/8/18 Email to Jesse re: Acceptance of Service	0.1
1/11/18 Email from Jesse re: Service	0.1
1/11/18 Email to Jesse re: Service	0.1
1/11/18 Review Court's Civil Standing Order	0.2
1/12/18 Email from Jesse re: Waiver of Service	0.1
1/12/18 Review Order referring Case to Magistrate	0.1
1/13/18 Call w/ Tad re: Service	0.3
1/17/18 Email to Jesse re: Waiver of Service	0.1
1/17/18 Reviewing Proposed Waiver of Service	0.2
1/25/18 Reviewing File Waiver of Service	0.1
3/1/18 Research on Unnecessary Rigor Claim	2.5
3/2/18 Research on Unnecessary Rigor and UGIA	1.1
3/5/18 Email to Jesse re: Amended Complaint	0.1
3/5/18 Email from Jesse re: Amended Complaint	0.1
3/5/18 Email to Jesse re: Additional Claim	0.1
3/5/18 Email from Jesse re: Stipulation to Amend	0.1
3/6/18 Drafting Amended Complaint	0.5
3/6/18 Email to Tad re: Draft Amended Complaint	0.1
3/7/18 Email from Tad re: Edits to Amended Complaint	0.1
3/7/18 Edits to Draft Amended Complaint	0.3
3/7/18 Call w/ Tad re: Loss of Association	0.3
3/7/18 Filing Amended Complaint	0.1
3/9/18 Email from Jesse re: Filing Amended Complaint	0.1
3/9/18 Email to Jesse re: Amended Complaint Filed	0.1
3/9/18 Reviewing Defendants' Notices of Appearance	0.2
3/13/18 Reviewing Notice of Appearance - Hoagland	0.1

3/21/18	Reviewing Defendant's Answer	0.3
3/26/18	Comparing Answer to Amended Complaint, Noting Contested Allegations:	1.4
3/26/18	Call w/ Tad re Answer and Initial Disclosures	0.4
3/26/18	Drafting Plaintiff's Initial Disclosures	1.7
3/26/18	Drafting Proposed Scheduling Order	0.8
3/27/18	Edits to Scheduling Order	0.2
3/27/18	Drafting Attorney Planning Meeting Report	0.3
3/27/18	Call w/ Tad re: Attorney Planning Meeting Report	0.2
3/27/18	Email to Defs re: Proposed Scheduling Order	0.1
3/29/18	Email from Tad re: Edit to Attorney Planning Meeting Report	0.1
3/29/18	Call w/ Tad and Client re: Schultz's Report	0.5
4/2/18	Email to Defs re: Thoughts on Scheduling Order	0.1
4/3/18	Email from Def re: Edits to Schedule	0.1
4/4/18	Edits to Scheduling Order and Planning Report	0.3
4/4/18	Email to Defs re: Proposed Scheduling Order	0.1
4/4/18	Email to Def re: Changes to Docs	0.1
4/4/18	Email from Def re: Acceptance of Scheduling Order	0.1
4/4/18	Filing Attorney Planning Meeting Report	0.1
4/9/18	Email to Client re: Scheduling Order	0.1
4/9/18	Call w/ Client re: Schedule	0.5
4/15/18	Drafting and Compling Initial Disclosures	1.4
4/15/18	Call w/Tad re: Initial Disclosures	0.3
4/16/18	Edits to Initial Disclosures	0.2
4/16/18	Email to Def re: Initial Disclosures	0.1
4/16/18	Email from Def re: Def Initial Disclosures	0.2
4/24/18	Email from Client re: Status	0.1
4/24/18	Email to Client re: Status	0.1
4/26/18	Draft First Set of Discovery to Defs	1.9
4/26/18	Email from Tad re: Edits to Discovery	0.2
4/26/18	Call w/ Tad re: Discovery	0.2
4/26/18	Edits to First Set of Discovery	0.3
4/27/18	Email from Tad re: First Set of Discovery	0.1
4/27/18	Email to Def re: First Set of Discovery	0.1
4/30/18	Email to Client re: First Set of Discovery	0.1
4/30/18	Phone Call with Client re: Discovery	0.3
5/1/18	Drafting Subpoena to AG's Office	0.4
5/1/18	Email to Tad re: Draft Subpoena	0.1
5/1/18	Email from Tad re: Edits to Subpoena	0.1
5/1/18	Review Court Ordered Scheduling Order	0.4
5/1/18	Call w/ Tad re Subpoena to AG	0.2
5/7/18	Email from Client re: Subpoena	0.1
5/7/18	Email to Client re: Subpoena Status	0.1
5/8/18	Drafting Notice of Intent to Serve Subpoena (AG)	0.1
5/8/18	Email from Client re: Davis County Litigation	0.2
5/8/18	Email to Def re: AG Subpoena	0.1
5/11/18	Email from Client re: Jail Death Statistics	0.2
5/11/18	Email from Client re: Similar Jail Death Suit	0.2
5/14/18	Email from Def re: AG Subpoena	0.1
5/22/18	Email from AG's Office re: Subpoena	0.1

5/23/18 Email to AG's Office re: Schedule Call	0.1
5/24/18 Phone Call with AG's Office re: Subpoena	0.7
5/25/18 Email from Client re: Sheriff Richardson	0.1
6/4/18 Email from AG re: Subpoena	0.1
6/4/18 Email to AG re: Subpoena	0.1
6/5/18 Review AG's Mot to Quash Subpoena	0.3
6/6/18 Email to Def re: Status of Discovery Response	0.1
6/7/18 Email from Def re: Extension on Discovery	0.1
6/8/18 Call w/ Tad re: Discovery Extension	0.4
6/10/18 Call w/ Client re: Discovery Extension	0.2
6/10/18 Email from Client re: Value of Case	0.1
6/11/18 Email from Client re: Spillma Training	0.2
6/11/18 Email to Def re: Granting Extension	0.2
6/11/18 Email from Def re: Extension on Discovery	0.1
6/11/18 Email to AG re: Draft Protective Order	0.1
6/11/18 Email from AG re: Protective Order	0.1
6/12/18 Email from Def re: Deposition Availability	0.1
6/13/18 Email from AG re: Call to Discuss Subpoena	0.1
6/13/18 Review AG's Spreadsheet re: Investigative File	0.3
6/14/18 Call with AG re: Subpoena	0.5
6/14/18 Review AG's Proposed Motion and Protective Order	0.3
6/15/18 Review Filed Motion for Protective Order	0.1
6/19/18 Review Signed Protective Order	0.1
6/20/18 Email to Def re: Scheduling Depos	0.1
6/22/18 Email from Def re: Discovery Response	0.2
6/25/18 Email to Client re: Discovery Response	0.1
6/25/18 Drafting Subpoena to Weber County	0.3
6/25/18 Summarizing Def Discovery Response	4
6/25/18 Call w/ Tad re Def's Discovery Response	0.6
6/25/18 Review Docket Text Order re: Mot to Quash	0.1
6/26/18 Email to Def re: Depos	0.1
7/10/18 Email to Def re: AG Subpoena/ Depos	0.1
7/12/18 Email from Def re: Subpoena/ Depos	0.1
7/13/18 Email to Def re: Notice of Intene to Subpoena Weber County	0.1
7/16/18 Drafting Notice of Depositions (4)	0.3
7/16/18 Email to Def re: Notice of Subpoenas	0.1
7/19/18 Drafting Comprehensive Summary of Documents Produced in Discovery	2.4
7/19/18 Review Notice of Appearance - Mike Homer	0.1
7/20/18 Review Documents produced by AG	2.1
7/20/18 Call w/ Tad re AG Subpoena Response	0.5
7/22/18 Compiling Documents for Debra Schultz	0.3
7/22/18 Email to Def re: AG Subpoena Response	0.1
7/22/18 Call w/ Tad re: Discovery Strategy	1.3
7/25/18 Email to Def re: Expert Disclosure Deadline	0.1
7/25/18 Email from Def re: Agreeing to Extension	0.1
7/25/18 Drafting Motion and Order to Amend Scheduling Order	0.3
7/25/18 Email to Def re: Motion for Extension	0.1
7/25/18 Drafting Amended Notice for Lucius Depo	0.1
7/25/18 Drafting Amended Notice for Deputy Lloyd's Depo	0.1

7/27/18 Email from Def re: Stipulating to Extension	0.1
7/30/18 Review Notice of Appearance - Sarah Jenkins	0.1
7/30/18 File Motion to Extend Expert Disclosure Deadline	0.1
7/30/18 Phone Call w/ Client re: Discovery Status	0.6
7/30/18 Email to Client re: Discovery File	0.1
7/30/18 Drafting Plaintiff's 2nd Set of Discovery	0.2
7/30/18 Email to Def re: 2nd Set of Discovery	0.1
7/30/18 Call w/ Tad re Discovery	0.2
7/31/18 Email from Client re: Anderson's Doctor's Appt	0.1
7/31/18 Review Todd Vinger CV	0.4
7/31/18 Review Vinger Draft Expert Report	0.6
7/31/18 Call w/ Tad and Client re: Anderson	1.1
8/1/18 Review Entered Amended Scheduled Order	0.1
8/1/18 Drafting Detailed Summary of AG's Report	3.2
8/2/18 Email to Client re: Deposition Schedule	0.1
8/12/18 Email from Client re: Depositions	0.1
8/13/18 Phone Call w/ Client re: Depositions	0.9
8/13/18 Email to Def re: Rogers Depo	0.1
8/14/18 Review Debra Schultz Report	0.3
8/15/17 Email from Def re: Rogers Availability	0.1
8/17/17 Drafting Amended Notice for Ondricek Depo	0.1
8/17/17 Drafting Notice for Rogers Depo	0.1
8/18/18 Review Recent Caselaw on Qualified Immunity	0.3
8/18/18 Reviewing Caselaw on Deliberate Indifference Standard for Pre-Trial Det:	0.9
8/18/18 Review Ackerman AG Interview	0.5
8/18/18 Review EMS Havery AG Interview	0.7
8/18/18 Review EMS Pollock AG Interview	0.6
8/18/18 Review Nurse Ondricek AG Interview	0.6
8/18/18 Review Nurse Layton AG Interview	0.5
8/19/18 Review Wall and Lucius AG Interview	1
8/19/18 Review Rogers AG Interview	1
8/19/18 Review Lloyd and Johnson AG Interview	1.4
8/19/18 Review Nurse Anderson AG Interview	1.2
8/20/18 Prepare with Tad for Depositions	5.8
8/20/18 Review Lopez AG Interview	0.4
8/20/18 Review Langston AG Interview	0.5
8/20/18 Review Montoya etc AG Interview	1.1
8/20/18 Review Slater etc AG Interview	1.2
8/21/18 Prepare with Tad for Depositions	6.3
8/21/18 Review Cindy Interview	1.3
8/22/18 Meeting w/ Tad and Cindy re: Depositions	0.5
8/22/18 Lloyd Deposition	1.4
8/22/18 Preparing w/Tad for Rogers Depo	1.2
8/22/18 Rogers Deposition	1
8/22/18 Prepare w/ Tad for Anderson Depo	1.4
8/23/18 Meeting w/ Tad and Cindy re: Depositions	0.5
8/23/18 Anderson Deposition	1.5
8/23/18 Prepare w/Tad re: Ondricek Depo	0.8
8/23/18 Ondricek Deposition	1.3

8/23/18	Preparing w/ Tad re; Richardson Depo	0.7
8/23/18	Preparing for Richardson Depo	2.1
8/24/18	Meeting w/ Tad and Cindy re: Depositions	0.6
8/24/18	Richardson Depo	1.3
8/24/18	Preparing w/ Tad for Lucius Depo	0.3
8/24/18	Lucius Deposition	1.3
8/29/18	Email from Def re: Second Discovery Request	0.1
8/29/18	Review Def's Response to 2nd Set of Discovery	0.2
8/29/18	Email to Vinger re: Expert Report	0.1
8/29/18	Email from Vinger re: Expert Report	0.1
8/30/18	Drafting Plaintiff's Expert Disclosure	0.5
9/4/18	Review Amended Vinger Report	0.3
9/4/18	Review Text cited in Vinger Report	1.8
9/6/18	Phone Call to Vinger re: Report	0.1
9/6/18	Email from Vinger re: Amended Report	0.1
9/6/18	Email to Vinger re: Factual Section in Report	0.1
9/7/18	Phone Call w/ Vinger re: Amended Report	0.4
9/10/18	Email from Client re: Outstanding Discovery	0.1
9/10/18	Email to Client re: Remaining Discovery	0.1
9/11/18	Review New Amended Vinger Report	0.3
9/11/18	Call w/ Tad re Remaining Discovery	0.6
9/11/18	Drafting 3rd Set of Discovery to Def	0.5
9/11/18	Email to Tad re: 3rd Set of Discovery	0.1
9/11/18	Email from Tad re: Edits to 3rd Set of Discovery	0.1
9/11/18	Edits to 3rd Set of Discovery	0.1
9/11/18	Review Starr's Report	0.2
9/12/18	Drafting Plaintiff's Supplemental Expert Disclosure	0.2
9/12/18	Email to Def re: 3rd Set of Discovery	0.1
9/13/18	Review Nurse Anderson's Depo Transcript	0.6
9/13/18	Review Ondricek Dep Transcript	0.5
9/13/18	Review Lloyd Depo Transcript	0.5
9/13/18	Review Rogers Depo Transcript	0.4
9/13/18	Review Lucius Depo Transcript	0.3
9/13/18	Review Richardson Depo Transcript	0.3
9/28/18	Review Defs' Expert Disclosure	0.2
9/28/18	Review Tubbs Expert Report	0.4
9/28/18	Review Def's Designation of Experts	0.1
10/2/18	Research on Dr. Tubbs	2.4
10/3/18	Reviewing Article on Meth Blood Concentrations	0.3
10/3/18	Email from Def re: First Discovery Request	0.1
10/3/18	Review Def's First Set of Discovery	0.4
10/3/18	Email to Client re: Def First Discovery	0.1
10/5/18	Call w/ Tad re: Defendant's Discovery Requests	0.4
10/5/18	Phone Call w/ Client re: RFAs	0.3
10/5/18	Draft Response to Def Request for Admissions	0.4
10/5/18	Email to Def re: Tubbs Protocols	0.1
10/5/18	Research for Motion in Limine re: Tubbs Report	0.6
10/5/18	Drafting Plaintiff's Motion in Limine re: Tubbs Report	0.6
10/5/18	Email to Tad re: Response to RFAs	0.1

10/5/18 Email from Tad re: Edits	0.1
10/8/18 Edits to Response to RFAs	0.1
10/8/18 Email to Def re: Response to RFAs	0.1
10/10/18 Phone Call w/ Client re: Ints and RFP	0.4
10/10/18 Email to Def re: Narrowing Ints and RFPs	0.1
10/10/18 Email to Client re: Heather's Tax Returns	0.2
10/11/18 Email from Def re: Ints and RFPs	0.1
10/11/18 Email to Client re: Def's Discovery Request	0.1
10/11/18 Email from Def re: Third Set of Discovery	0.1
10/15/18 Review Def's Response to 3rd Set of Discovery	0.2
10/15/18 Email to Tad re: 3rd Set of Discovery	0.1
10/15/18 Call w/ Tad re: P's SMJ Motion	0.8
10/15/18 Email from Tad re: SMJ on Punitives	0.1
10/22/18 Drafting Fact Section for P's SMJ Motion	5.1
10/22/18 Email from Client re: Heather's Tax Returns	0.1
10/22/18 Review Def's Opposition to Motion to Strike	0.7
10/23/18 Research re: Deliberate Indifferen for SMJ	4.2
10/23/18 Email to Def re: Tubbs Protocols	0.1
10/23/18 Email from Def re: Will Provide Protocols	0.1
10/23/18 Drafting Deliberate Indifference Sction for SMJ	1.2
10/24/18 Drafting Deliberate Indifference Sction for SMJ	5.1
10/25/18 Drafting Deliberate Indifference Sction for SMJ	0.8
10/25/18 Email to Tad re: Draft SMJ	0.1
10/26/18 Email from Def re: First Supp Disclosures	0.1
10/26/18 Reviewing Def First Supp Disclosures	2.3
10/30/18 Email to Client re: Def First Supp Disclosures	0.1
10/31/18 Email to Def re: Extension on Def Discovery	0.1
11/1/18 Call w/ Tad re: Dispositive Motions/ Discovery	2.7
11/5/18 Draft Order granting Continuance re Reply on MiL	0.2
11/8/18 Drafting Response to Def's Discovery	0.7
11/8/18 Email to Client re: Draft Response to Discovery	0.1
11/8/18 Email from Client re: Draft Response to Discovery	0.1
11/9/18 Edits to P's Response to Def's Discovery	0.2
11/9/18 Email to Def re: Response to Discovery	0.1
11/11/18 Email from Client re: Draft Response to Discovery	0.1
11/14/18 Drafting Argument for P's Motion for SMJ	5.1
11/15/18 Drafting Argument for P's Motion for SMJ	6.3
11/19/18 Edits to P's SMJ Motion	1.9
11/20/18 Edits to P's SMJ Motion	1
11/21/18 Call w/ Tad re: SMJ	0.2
11/21/18 File P's SMJ Motion	0.1
11/25/18 Email from Client re: SMJ	0.1
11/25/18 Email from Client re: SMJ	0.3
11/26/18 Preparing Exhibits for Conventional Filing re: SMJ	0.3
11/29/18 Email to Def re: Conventionally Filed Exhibits	0.1
12/10/18 Email from Def re: Extension to SMJ Response	0.1
12/10/18 Email to Def re: Extension	0.1
12/12/18 Review Def's Motion and Order for Extension to SMJ Deadline	0.2
12/13/18 Review Court's Order re: SMJ Extension	0.1

12/21/18	Review Def Notice of Withdrawal of Counselk	0.1
12/31/18	Email from Client re: Death Totals at Jails	0.1
1/8/19	Review Order vacating Status Conference	0.1
1/12/19	Email to Client re: Def's SMJ Briefs	0.1
1/12/19	Email from Client re: Def's SMJ Motion	0.1
1/12/19	Review Def's Opp to P's SMJ Motion	1.5
1/12/19	Review Def's Motion for SMJ	0.8
1/12/19	Call w/ Tad re: Def's Mots for SMJ	0.8
1/21/19	Research for P's Reply to SMJ	2.9
1/21/19	Drafting Reply to P'S SMJ	0.3
1/24/19	Drafting Reply to P'S SMJ	5.4
1/25/19	Drafting Reply to P'S SMJ	6.1
1/25/19	File Reply to P's SMJ Motion	0.1
1/28/19	Email from Client re: SMJ Motions	0.1
2/1/19	Research on Def's Caselaw in SMJ Motion	4.9
2/1/19	Drafting Opp to D's SMJ Motion	2.6
2/4/19	Drafting Opp to D's SMJ Motion	3.9
2/7/19	Drafting Opp to D's SMJ Motion	1.5
2/8/19	Drafting Opp to D's SMJ Motion	0.9
2/8/19	Filing Opp to D's SMJ Motion	0.1
2/13/19	Review Draft Motion for Extension to SMJ Briefing	0.2
2/14/19	Review Docket Entry granting Extension	0.1
3/1/19	Review D's Reply to D's SMJ Mot	1.1
3/1/19	Draft Request to Submit P's SMJ	0.1
3/20/19	Phone Call w/ Client re: hearing	0.3
4/5/19	Email from Client re: Hearing	0.1
4/23/19	Email from Def re: Hearing	0.1
4/26/19	Email from Def re: Hearing	0.1
4/29/19	Email to Def re: Schedule for Hearing	0.1
4/29/19	Email from Def re: Hearing and MiL	0.1
4/29/19	Email to Def re: Schedule for Hearing	0.1
5/3/19	Email from Def re: Schedule for Hearing	0.1
5/3/19	Email to Def re: Schedule for Hearing	0.1
5/4/19	Prepare for SMJ Hearing	1.4
5/5/19	Prepare for SMJ Hearing	2.7
5/6/19	Review Def's Draft Proposed Order re: Argument Schedule	0.1
5/6/19	Prepare for SMJ Hearing	3.8
5/6/19	Call w/ Tad re: Oral Argument	1.8
5/7/19	Prepare for SMJ Hearing	2
5/7/19	SMJ Hearing	2.2
5/8/19	Review Court's Order re: Supplemental Briefing	0.2
5/9/19	Phone Call w/ Todd Vinger	0.3
5/9/19	Drafting Affidavit for Tood Vinger's Review	0.5
5/9/19	Research on Expert Reports and SMJ	1.3
5/15/19	Drafting P's Supplemental Brief re: Expert Reports	1.1
5/15/19	Review Def's Supp Brief re: Expert Report	0.4
5/16/19	Drafting P's Supplemental Brief re: Expert Reports	1.3
5/16/19	Email from Tad re: Edits to Supp Brief	0.3
5/17/19	Drafting P's Supplemental Brief re: Expert Reports	0.6

5/17/19	Review Schult's Declaration	0.2
5/17/19	Review Starr's Declaration	0.2
5/22/19	Email to Client re: Supplemental Briefs	0.1
6/3/19	Review Def's Mot for Leave to Object to Declarations	0.4
6/6/19	Email from Tad re: Edits to Opp Brief	0.1
6/6/19	Drafting Opp to Mot for Leave to Object	0.3
6/11/19	Review Def's Notice of Supplemental Authority	0.7
6/21/19	Review Def's Reply re: Mot for Leave to Object	0.3
9/23/19	Review Order on SMJ	1.3
9/23/19	Review Order on MiL	0.3
9/27/19	Review Def's Mot to Amend Ruling	0.6
10/2/19	Draft Opp to Mot to Amend Ruling	2.1
10/2/19	Research on Def's Mot to Amend Ruling	1.4
10/16/19	Review Notice of Appeal	0.1
10/16/19	Review Def's Reply to Motion to Amend Ruling	0.4
10/22/19	Review Def's Entry of Appearance	0.1
10/22/19	Review Transcript Order Form	0.1
10/24/19	Review Def's Docketing Statement	0.2
10/24/19	Phone Call w/ Tad re: Cross-Appeal	0.7
10/28/19	Call w/ Tad re: Cross Appeal	0.9
10/29/19	Research on Interlocutory Jurisdiction over Grant of Qualified Immunity	2.9
10/30/19	Drafting Notice of Cross Appeal	0.1
11/4/19	Email from Def re: Mot to Dismiss Cross Appeal	0.2
11/7/19	Email to Def re: Cross Appeal	0.1
10/28/19	Drafting Notice of Appearance for Appeal	0.1
11/8/19	Drafting Docketing Statement for Cross Appeal	0.6
11/8/19	Drafting Transcript Order Form	0.1
11/8/19	Call w/ Tad re: Docketing Form	0.5
11/8/19	Call w/ Tad re: Appeal Strategy	2.4
11/13/19	Review Court's Request for Briefing on Jurisdiction	0.1
11/26/19	Research on Pendent Jurisdiction	0.7
11/26/19	Drafting Brief re: Clarifying Appellate Jurisdiction	3.8
11/27/19	Drafting Brief re: Appellate Jurisdiction	1
12/16/19	Review Def's Jurisdictional Brief	0.4
1/3/20	Call w/ Tad re: Appeal and Jurisdiction	1.8
1/3/20	Review Court's Order re: Jurisdiction	0.1
1/13/20	Review Court's Order re: Mediation	0.1
1/13/20	Drafting Mediation Form	0.1
1/13/20	Phone Call w/ Tad and Client re Mediation	1.1
1/20/20	Phone Call w/ Tad and Client re Mediation	0.4
1/21/20	Mediation Conference	1.1
1/21/20	Phone Call w/ Client re Mediation	0.5
1/21/20	Call w/ Tad re Mediation and Appeal	0.7
2/6/20	Email from Def re: Extension on Appellate Brief	0.1
3/13/20	Review Def's Appellate Brief	2.3
3/13/20	Email to Client re: Def's Appellate Brief	0.1
3/20/20	Research Cases in Def's Appellate Brief	6.1
3/23/20	Drafting Appellee's Brief	4.2
3/23/20	Research on Deliberate Indifference	3.3

3/26/20 Drafting Appellee's Brief	5.6
3/29/20 Call w/ Tad and Client re: Appeal	0.4
3/29/20 Call w/ Tad re Jail Death Stats	0.7
3/31/20 Drafting Appellee's Brief	3.8
4/1/20 Drafting Appellee's Brief	6.1
4/6/20 Drafting Appellee's Brief	5.5
4/9/20 Drafting Appellee's Brief	4.9
4/13/20 Drafting Appellee's Brief	0.8
4/15/20 Drafting Appellee's Brief	9.1
4/16/20 Email to Client re: Appellee's Brief	0.1
4/17/20 Corrections to Appellee's Brief	0.7
5/11/20 Email from Def re: Timing of Briefs	0.1
5/13/20 Review Stipulated Motion for Extension	0.1
6/1/20 Review Def's Reply Brief on Appeal	1.2
6/1/20 Email to Client re: Reply Brief	0.1
6/2/20 Email from Client re: Status of Appeal	0.1
6/5/20 Email from Client re: Appeal	0.1
6/5/20 Research Defendant's Caselaw in Third Brief	2.9
6/8/20 Drafting Appellate Reply Brief	2.4
6/11/20 Drafting Appellate Reply Brief	4.1
6/19/20 Drafting Appellate Reply Brief	3
6/21/20 Drafting Appellate Reply Brief	5.2
6/22/20 Drafting Appellate Reply Brief	6.8
9/18/20 Review Calender Notice	0.1
9/18/20 Call w/ Client re: Hearing Date	0.3
9/21/20 Review Order denying Def's Mot to Amend Order	0.8
9/21/20 Call w/ Client re: Order denying Mot to Amend	0.6
9/23/20 Email to Client re: Order denying Mot to Amend	0.1
9/23/20 Call w/ Tad re: Appendix	0.4
9/25/20 Drafting Calendar Acknowledgment Form	0.1
10/13/20 Preparing for Oral Argument on Appeal	3.8
10/14/20 Moot Oral Argument	2.5
10/16/20 Preparing for Oral Argument on Appeal	1.9
11/13/20 Preparing for Oral Argument on Appeal	0.3
11/14/20 Preparing for Oral Argument on Appeal	0.7
11/15/20 Preparing for Oral Argument on Appeal	1.1
11/16/20 Preparing for Oral Argument on Appeal	4.6
11/16/20 Email w/ Client re: Oral Argument Tomorrow	0.1
11/16/20 Call w/ Tad and Client re: Oral Argument	0.4
11/17/20 Preparing for Oral Argument on Appeal	0.6
11/17/20 Attending Oral Argument	1.4
11/17/20 Call w/ Tad re: Oral Argument	1.1
11/17/20 Call w/ Client re: Oral Argument	0.9
2/3/21 Review 10th Circuit Decision	0.7
2/3/21 Phone Call w/ Client re: 10th Circuit Ruling	0.7
2/3/21 Email to Client re: Decision	0.1
2/3/21 Call w/ Tad re: 10th Circuit Order	0.9
2/25/21 Email to Def re: Scheduling Conference	0.1
2/26/21 Review Court's Notice of Hearing	0.1

2/26/21 Phone Call w/ Defendant re: Schedule	0.2
3/29/21 Preparing for Scheduling Hearing	0.9
3/29/21 Phone Call w/ Client re: Scheduling Hearing	0.3
3/30/21 Call w/ Tad re: Hearing	0.3
3/30/21 Attending Scheduling Hearing	1
3/30/21 Phone Call w/ Client re Schedule	0.2
3/31/21 Review Trial Scheduling Order	0.4
5/20/21 Research on Value of Case re Simialr Verdicts	3.8
7/7/21 Email to Vinger re: Trial	0.1
7/8/21 Call w/ Vinger re: Trial	0.1
8/6/21 Review Def Notice of Withdrawal	0.1
9/17/21 Reviewing Transcripts for Trial Prep	2.3
9/20/21 Trial Prep w/ Tad re: General Trial Strategy	7.1
9/20/21 Email to Def re: Cindy Transcript	0.1
9/21/21 Trial Prep w/ Tad re Witnesses, Opening, Jury Instructions	6.7
9/22/21 Trial Prep w/ Tad re: Witnesses	7.3
9/23/21 Trial Prepre: Experts and Motions in Limine	5.2
9/24/21 Trial Prep w/ Tad re:Exhibits and Remaining Tasks	4.7
11/17/21 Email to Vinger re: Trial	0.1
11/18/21 Call w/ Vinger re: Trial	0.3
11/19/21 Drafting First Supplement to I. D.	0.6
12/2/21 Drafting GRAMMA request re: Protocols at Jail	0.3
12/5/21 Call w/ Tad re: Exhibits	1.4
12/6/21 Compiling P's Trial Exhibits	1.2
12/7/21 Preparing P'S Trial Exhibits	1.1
12/8/21 Email from D re: Objections to Trial Exhibits	0.2
12/8/21 Call w/ Tad re: Trial Exhibits	0.6
12/9/21 Amended Trial Exhibts per Email	0.4
12/10/21 Email from D re: Trial Exhibits	0.1
12/13/21 Call w/ Tad re: Themes/Exhibits	0.8
12/13/21 Email from Tad re: Trial Themes/Exhibits	0.2
12/13/21 Email to D re: Additional Trial Exhibit	0.1
12/15/21 Reviewing Def's Trial Exhibits	0.7
12/15/21 Email from D re: Trial Deadlines	0.2
12/15/21 Email from Def re: Exhibit 220	0.1
12/17/21 Review D's Supp to Trial Exhibits	0.1
12/18/21 Email from Def re: Exhibits for Opening	0.1
12/18/21 Email from Def re: Meet and Confer for MiLs	0.4
12/20/21 Response to D's Email re: Exhibits and Deadlines	0.3
12/20/21 Drafting Response to Def's Proposed Mils	0.5
12/20/21 Drafting List of P's Proposed Mils	0.8
12/21/21 Drafting Proposed Jury Instructions	4.7
12/21/21 Drafting Special Verdict Form	1.3
12/22/21 Email from Def re: Additional MiL	0.1
12/22/21 Email from Def re Response to P's Proposed MiL	0.4
12/23/21 Review Def MiL Photos	0.5
12/23/21 Drafting MiL re: Evidence of Prior Substance Abuse	1.3
12/23/21 Review Def MiL Autopsy Photos	0.5
12/24/21 Email from Def re: Additional MiL	0.1

12/24/21 Drafting Proposed Jury Instructions	1.4
12/24/21 Drafting MiL re: Negligence and Malpractice	0.9
12/24/21 Review Def MiL Damages Computation	0.6
12/26/21 Drafting MiL re: Children and Adoption	1.2
12/26/21 Drafting MiL re: Mental Health	1.4
12/26/21 Drafting MiL re: Arrest and Charges	1.9
12/26/21 Email from Def re: Additional MiL	0.1
12/26/21 Review Tad Draft of Verdict Form	0.2
12/26/21 Call w/ Tad re: Jury Instructions	2.7
12/26/21 Call w/ Tad re Verdict Form	0.9
12/26/21 Call w/ Tad re: Trial Prep/ Appellate Ruling's Significance	1.1
12/27/21 Call w/ Tad re: Jury Instructions and MiL	0.6
12/27/21 Call w/ Tad re: MiL/ Nursing Protocols	1.9
12/27/21 Email to Tad re: Def's Additional MiL	0.1
12/27/21 Email to Def re: Position on Additional MiLs	0.2
12/27/21 Review Def MiL re: Actuarial Tables	0.5
12/27/21 Drafting MiL re: Expert Testimony on Meth	2.8
12/27/21 Drafting MiL re: Criminal History	2.1
12/27/21 Drafting MiL re: ME Opinion	1.3
12/28/21 Email from Tad re: Jury Instruction Edits	0.2
12/28/21 Edits to Jury Instructions	0.6
12/28/21 Review Def MiL re: Austen Rogers	0.5
12/28/21 Review Def MiL re: Protocols	0.6
12/28/21 Drafting MiL re: AG not Charging	1.5
12/28/21 Drafting MiL re: AG Report	0.9
12/28/21 Drafting Proposed Jury Instructions	1.7
12/28/21 Drafting Special Verdict Form	2.1
12/28/21 Edits to MiLs	2.9
12/28/21 Email from Tad re: Verdict Form	0.2
12/28/21 Call w/ Tad re: Verdict Form	0.7
12/29/21 Call w/ Tad re: MiL and General Trial Prep	3.3
12/29/21 Review Def's Proposed Jury Instructions	1.3
12/29/21 Email from Def re: Meet and Confer	0.1
12/30/21 Email from Def re: Meet and Confer	0.1
12/30/21 Review D's Supp to Initial Disclosures	0.2
12/30/21 Review Def Response to MIL re: AG Report	0.2
12/31/21 Draft Witness List	0.3
12/31/21 Review Def's Revised Preliminary Instructions	0.5
12/31/21 Review Def's Revised Substantive Instructions	0.8
12/31/21 Review Def's Proposed Verdict Form	0.4
12/31/21 Drafting Notes on Instructions for Meet and Confer	0.7
1/1/22 Meet and Confer w/ Def	0.7
1/2/22 Drafting Opp to MiL Childhood Photos	1.2
1/2/22 Drafting Opp to MiL Autopsy Photos	1.8
1/2/22 Drafting Opp to MiL Actuarial Table	1.1
1/2/22 Email from Def re: Witness, Instructions	0.2
1/2/22 Merging Edits to Jury Instructions	0.6
1/3/22 Drafting Opp to MiL Damages Calculation	2.7
1/3/22 Review Proposed Order re: MiL AG Report	0.1

1/3/22	Review Def Opp to MiL AG Declination	0.5
1/3/22	Drafting Subpoenas to Witnesses	0.4
1/4/22	Review Proposed Joint Jury Instructions	1.2
1/4/22	Review Order allowing Expedited Discovery	0.1
1/4/22	Call w/ Tad re: Order allowing Discovery	0.8
1/4/22	Review Def's Response to MiL Negligence/Malpractice	0.4
1/4/22	Review Order setting Status Conference	0.1
1/4/22	Edits to Opps to MiLs Photos, Damages, Table	0.9
1/4/22	Call w/ Def re: Cancelled Trial	0.1
1/5/22	Review Def's Expedited Discovery Rquests	0.4
1/5/22	Call w/ Client re: Expedited Discovery/ Trial	0.6
1/6/22	Drafting Voire Dire Questions	0.8
1/6/22	Status Conference w/ Court	0.6
1/10/22	Review Def's Proposed Trial Order	0.3
1/10/22	Review Def's Voire Dire Questions	0.2
1/10/22	Email to Def re: Voire Dire	0.1
1/11/22	Email to Def re: Proposed Trial Order	0.1
1/11/22	Email from Def re: Proposed Trial Order	0.1
1/11/22	Review Notice of Hearing	0.1
1/12/22	Drafting Response to Def's Expedited Discovery	1.4
1/12/22	Review Tad's Proposed Voire Dire	0.2
1/12/22	Email from Def re: Expedited Discovery	0.1
1/13/22	Review Tad's Edits to Discovery Response	0.3
1/13/22	Call w/ Tad re Voire Dire	0.1
1/13/22	Review Amended Notice of Hearing	0.1
1/13/22	Call w/ Tad re: Revised Discovery	0.5
1/14/22	Call w/ Client re: Trial Strategy	0.8
1/14/22	Email from Client re: Trial Strategy	0.1
1/14/22	Review Motion to Amend Trial Order	0.2
1/14/22	Review Order granting Motion to Amend	0.1
1/18/22	Review Court's Trial Order	0.2
1/19/22	Drafting New Proposal on Jury Questionnaire	0.5
1/21/22	Email to Def re: Voire Dire Proposal	0.1
1/25/22	Email from Def re: Verdict Form	0.1
1/26/22	Email to Def re: Verdict Form	0.1
1/26/22	Edits to P's Verdict Form	0.3
1/26/22	Edits to P's Verdict Form on Punitive Damages	0.2
1/27/22	Email from Def re: Instructions and Verdict Forms	0.1
1/27/22	Draft Opp to MiL re Rogers	0.8
1/27/22	Draft Opp to MiL re Protocols	0.3
1/27/22	Review Def's Opp to MiL re: Experts & Arrest	0.6
1/28/22	Email from Def re: Joint Proposed Jury Instructions	0.2
1/28/22	Email to Def re: New Verdict Forms	0.1
1/28/22	Email from Def re: Submitting Verdict Forms	0.1
1/28/22	Review and Email to Def re: Proposed Filing Verdict Forms	0.2
1/28/22	Edits to Opp to MiL Rogers & Protocols	0.3
1/29/22	Review Def's Supplement to MiL Damages and Discovery	0.1
1/29/22	Review Def's Opp to MiL re: Adoption, Health, and Drugs	0.7
1/29/22	Review Def's Opp to MiL re: AG Declination	0.5

1/29/22	Review Def's Opp to MiL re: ME Opinion	0.3
2/7/22	Reviewing Pics Sent by Client for Discovery	0.3
2/7/22	Email to Client re: Discovery Response/Pics	0.1
2/9/22	Drafting P's Objections to Jury Instructions	4.6
2/9/22	Drafting Objections to Verdict Form	0.5
2/10/22	Email from Client re: Date/Location of Pics	0.2
2/11/22	Drafting Objections to Jur Instructions	2.4
2/11/22	Edits to objection to Verdict Form	0.2
2/11/22	Review Def's Objections to Verdict Form	0.3
2/11/22	Email from Court re: Trial Date	0.1
2/11/22	Review Def's Objections to Jury Instructions	0.8
2/14/22	Review Def's Notice of Appearance	0.1
2/15/22	Email to Clerk re: Available Trial Dates	0.1
2/16/22	Meeting with Jury Analysis	1.2
2/16/22	Email from Clerk re: Trial Dates	0.1
2/17/22	Drafting Summary of Case for Jury Analysis	1.2
2/17/22	Email to Def re: Documents in response to Discovery	0.1
2/18/22	Review Tad's Edits to Case Summary	0.2
2/18/22	Review Def's Proposed Orders on MIL	0.3
2/21/22	Edits to Case Summary for Jury Analysis	0.2
2/21/22	Preparing for Hearing on MIL	2.8
2/21/22	Drafting Supplemental Response to D's Expedited Discovery	0.2
2/22/22	Email from Clerk re: Trial Dates	0.1
2/22/22	Email from Clerk re: Trial Dates	0.1
2/23/22	Preparing for Hearing on MIL	3.1
2/23/22	Preparing for Hearing on MiL	1.2
2/23/22	Hearing on MiL	1.8
2/24/22	Email from Def re: Word Version Objections	0.1
2/25/22	Email to Def re: Word Version of Objections	0.1
2/25/22	Drafting Response to Def's Objection re: Verdict Form	1.1
2/25/22	Drafting Response to Def's Objections to Instructions	7.2
2/26/22	Review Def's Response to P's Objections re: Verdict Form	0.1
2/26/22	Review Def's Response to P's Objections re Instructions	0.5
2/28/22	Email from Def re: Trial Availability	0.1
2/28/22	Email from Clerk re: Trial Dates	0.1
3/1/22	Email from Clerk re: Trial Dates	0.1
3/1/22	Email fro Def re: Trial Availability	0.1
3/2/22	Email to Defs re: Witness Availability	0.1
3/3/22	Call w/ Def re: Witness Availability	0.2
3/3/22	Review Amended Notice of Hearing	0.1
3/4/22	Review Amended Notice of Pretrial Conference	0.1
3/9/22	Edits to Case Summary for Jury Analysis	0.2
3/14/22	Reviewing Court's Orders on Motions in Limine	1.6
3/14/22	Call w/ Tad re: Orders on MiL	0.7
3/18/22	Edits to Case Summary for Jury Analysis	0.2
3/20/22	Email from Vinger re: Trial Date	0.1
3/22/22	Drafting Second Amended Initial Disclosures	0.2
3/23/22	Creating Number Calculations for Damages	0.5
4/1/22	Drafting Request for Judicial Notice	2.1

4/5/22	Review Def's Motion to Amend Trial Order	0.3
4/5/22	Call w/ Tad re: Motion to Amend	0.7
4/8/22	Review Def's Third Supplemental Initial Disclosure	0.1
4/13/22	Review Def's Opp to Motion for Judicial Notice	0.2
4/14/22	Drafting Subpoenas to Witnesses	0.3
4/14/22	Email to Def re: Subpoena to Defendants	0.1
4/19/22	Drafting Objection to Def's Opening Exhibits	1.2
4/19/22	Review Def's Objections to Opening Exhibits	0.2
4/19/22	Review Def's 901 Objection	0.2
4/19/22	Drafting Opposition to D's Motion to Amend	3.1
4/20/22	Email to Def re: Meet and Confer on Exhibits	0.4
4/21/22	Email to Def Re Extension on Trial Notebook	0.1
4/21/22	Email from Def re: Meet and Confer on Exhibits	0.1
4/22/22	Drafting Stipulation and Order re Extension on Trial Notebook	0.2
4/22/22	Email from Def re: Edits to Stipulation	0.1
4/22/22	Edits to Stipulation	0.1
4/22/22	Email from Def re: Trial Notebook	0.1
4/22/22	Review Def's Witness and Exhibit List	0.2
4/22/22	Drafting Witness and Exhibit List	0.3
4/22/22	Review Def's Trial Brief	0.6
4/22/22	Drafting P's Trial Brief	3.1
4/25/22	Attending Jury Analysis Report/Presentation	1.1
4/25/22	Reviewing Jury Analysis Written Report	0.7
4/25/22	Review Order re: Extension on Trial Notebook	0.1
4/27/22	Email to Def re: Admissibility of Def's Trial Exhibits	0.3
4/28/22	Review Def's Opp to Mot to Exclude Opening Exhibits	0.3
4/28/22	Drafting Opp to Def's 901 Objections	0.9
4/28/22	Drafting Opp to Def's Objections to Opening Exhibits	1.4
4/29/22	Compiling Trial Notebook	3.3
5/6/22	Review Def's Reply to Motion to Strike Opening Exhibits	0.2
5/6/22	Email from Def re: Trial Notebook	0.1
5/6/22	Draft Reply to Motion to Strike Opening Exhibits	1.3
5/9/22	Review Request to Submit	0.1
5/10/22	Email to Def re: Updated Exhibit List	0.1
5/11/22	Review D's Reply to 901 Objections	0.2
5/12/22	Email from Def re: Demonstrative Exhibits	0.1
5/13/22	Review Request to Submit	0.1
5/13/22	Email from Tad Re: Demonstrative Exhibits	0.1
5/16/22	Phone Call w/ Tad re: Motions in Limine/Opening Exhibits	0.5
5/20/22	Email from Def re: Demonstrative Exhibits	0.1
5/22/22	Phone Call w/ Tad re: Witness Exhibits for Trial	0.9
5/24/22	Review D's Motion for Amended Scheduling Order	0.5
5/24/22	Review Hoffman's Expert Report	0.3
5/24/22	Call w/ Tad re: Motion to Amend & Hoffman Report	0.9
6/3/22	Email from Def re: Subpoenas	0.1
6/3/22	Email to Def re: Subpoenas	0.1
6/3/22	Email from Def re: Subpoenas	0.1
6/6/22	Email to Client re: Trial Prep	0.2
6/6/22	Response to D's Motion for New Expert	3.2

6/6/22	Email to Tad re: Opp to Motion for New Expert	0.1
6/6/22	Phone Call w/ Tad re: Opp to Mot for New Expert	0.4
6/7/22	Review Order re: Amended Trial Schedule	0.1
6/7/22	Call w/ Tad re: Amended Schedule	0.7
6/7/22	Editing Opp to Def's Motion to allow New Expert	0.2
6/9/22	Email from Def re Proof of Subpoenas	0.1
6/9/22	Email from Def re New MiL	0.1
6/9/22	Call w/ Tad re: Trial Strategy	1.8
6/13/22	Email from Tad re: Demonstrative Aids	0.3
6/13/22	Meet and Confer re: New MiL	0.2
6/13/22	Drafting Email to D re: Stance on MiL	0.1
6/13/22	Call w/ Tad re: MiL	0.5
6/13/22	Email from Def re: MiL	0.1
6/13/22	Review D's MiL re Loss of Income	0.6
6/13/22	Review D's MiL re Loss of Support	0.3
6/13/22	Review D's MiL re Dr. Starr	0.3
6/13/22	Review D's MiL re Todd Vinger	0.3
6/13/22	Call w/ Tad re: New MiL	0.4
6/18/22	Drafting Opp to MiL re Loss of Income	1.6
6/19/22	Drafting Opp to MiL re: Dr Starr	1.8
6/20/22	Drafting Opp to MiL re: Vinger	1.3
6/20/22	Drafting Opp to MiL re Filial Association	1.2
6/20/22	Edits to Opp to MiLs	0.4
6/21/22	Email from Tad re: Trial Witness Summaries	1.8
6/21/22	Review D's Reply to Motion for New Expert	0.2
6/21/22	Call w/ Tad re: Trial Witnesses	2.8
6/22/22	Review Request to Submit	0.1
6/22/22	Email from Def re: Demonstrative Exhibits	0.1
6/22/22	Review D's Errata	0.1
6/24/22	Phone Call w/ Tad re: Client's Testimony	0.9
6/24/22	Email to Tad re: Client Testimony	0.1
6/25/22	Drafting Subpoena to Layton	0.1
6/25/22	Email to Def re: Demonstrative Exhibits	0.1
6/27/22	Email to Def reL Proof of Subpoenas	0.1
6/28/22	Email to Def re: Stipulated Exhibits	0.1
6/28/22	Call w/ Tad re: Lloyd/Layton Trial Prep	2.1
6/29/22	Email from Tad re: Richardson Summary	0.2
6/29/22	Email from Def re: Proposed Stipulation on Exhibits	0.2
6/30/22	Email from Def re: Layton Subpoena	0.1
7/1/22	Review Court's Order on Outstanding Motions	0.4
7/1/22	Phone Call w/ Tad re Recent Ruling	1.1
7/2/22	Call w/ Tad re: Trial Themes and Strategies	1.4
7/2/22	Call w/ Tad re Experts	1
7/5/22	Review Def's Motion to Clarify Loss of Consortium	0.3
7/5/22	Email from Def re: Witness Order and Exhibits	0.1
7/5/22	Email to Def re: Witness Order	0.1
7/5/22	Call w/ Tad re: Anderson Trial Prep	2.3
7/6/22	Email from Def re: Witness Order	0.1
7/6/22	Email to Def re: Witness Order	0.1

7/6/22 Call w/ Client re: Trial Prep	1.8
7/6/22 Call w/ Tad re: New Expert	0.3
7/6/22 Drafting Motion to Substitute Expert	1.4
7/7/20 Drafting Opp to Motion to Clarify	1.8
7/7/22 Email to Clerk re: Motion to Substitute Expert	0.1
7/7/22 Email to Def re: Stipulation on Exhibits	0.1
7/7/22 Call w/ Tad re: Anderson Trial Prep	1.9
7/7/22 Review Tad's New Outline for Anderson Tetsimony	0.7
7/8/22 Review Def's Reply to Mot to Clarify	0.4
7/8/22 Call w/ Tad re: MIL on Negligence/Malpractice	0.4
7/8/22 Email to Tad re: Negligence and Malpractice	0.1
7/8/22 Video Call w/ Client re: Trial Prep	2.1
7/8/22 Email from Def re: Exs 27 - 28	0.1
7/8/22 Email to Def re: Exs 27-28	0.1
7/9/22 Email from Def re: Admissibility of Exhibits	0.1
7/9/22 Email from Defendant re: Expert Report	0.1
7/9/22 Call w/ Client re: Trial Exhibits	0.4
7/9/22 Email from Client re: Trial Exhibits	0.1
7/9/22 Review Pat's Letter	0.2
7/9/22 Review Pat's Revised Letter	0.1
7/9/22 Review Pat's Opinion Letter	0.3
7/9/22 Email to Def re: Pat's Expert Opinion	0.1
7/9/22 Email from Client re: Punitive Damages	0.2
7/10/22 Call w/ Client re: Punitive Damages	0.3
7/11/22 Review Request to Submit	0.1
7/11/22 Email to Vinger: Trial testimony	0.6
7/11/22 Email to Def re: Compromise on Exhibits	0.1
7/11/22 Call w/ Tad re: Objections to New Expert	0.5
7/11/22 Review D's Objections to Pat's Substitution	0.3
7/11/22 Review D's Objections to Court's Jury Instructions	0.5
7/11/22 Review D's Objections to Court's Verdict Form	0.2
7/11/22 Prepare for Final PreTrial Conference	3.8
7/11/22 Call w/ Vinger re Trial Prep	1.2
7/12/22 Prepare for Final PreTrial Conference	1.3
7/12/22 Attending Final PTC	2
7/12/22 Call w/ Client re: Trial Prep	1.9
7/13/22 Drafting Objections to Court's Jury Instructions	1.8
7/13/22 Email from Clerk re: Stipulated Exhibit	0.1
7/13/22 Review Court's Order on Judicial Notice	0.3
7/13/22 Review Court's Jury Instructions and Verdict Form	0.7
7/13/22 Review Court's Jury Verdict Form	0.2
7/13/22 Review Court's Order Allowing Pat to Substitute	0.2
7/13/22 Meet and Confer w/ Def	0.2
7/13/22 Review Depositions/ Draft Trial Outlines	7.8
7/13/22 Call w/ Tad re: Opening/Ondricek	2.4
7/14/22 Review D's Objections to Voie Dire	0.2
7/14/22 Email from Def re: Stipulated Trial Exhibits	0.2
7/14/22 Email to Vinger re: Trial Tetsimony	0.7
7/14/22 Email to Def re: Schedule for Witnesses	0.1

7/14/22	Reviewing Court's Newest Version of Instructions and Verdict Form	0.4
7/14/22	Call w/ Vinger re Trial Prep	1.5
7/14/22	Review AG Interviews/ Prep for Trial	7.7
7/14/22	Review Court Order on Voire Dire	0.1
7/15/22	Drafting P's List of Contested Exhibits	0.2
7/15/22	Reviewing D's List of Contested Exhibits	0.1
7/15/22	Email from Def re: Layton	0.1
7/15/22	Review Def's Objections to Special Verdict Form	0.2
7/15/22	Review Exhibits/ Trial Prep	3.8
7/15/22	Review D's Objections to Jury Instructions	0.2
7/16/22	Reviewing AG Interviews in Prep for Trial	1.3
7/16/22	Call w/ Tad re: Lloyd and Johnson	0.8
7/16/22	Email to Tad re: AG Interviews	0.1
7/16/22	Email to Tad re: Client Testimony Outline	0.4
7/16/22	Trial Preparation w/ Tad	12.2
7/17/22	Trial Preparation w/ Tad	9.1
7/18/22	Attending Trial	8.1
7/18/22	Trial Prep during Lunch Break	0.7
7/18/22	Trial Prep re Anderson/ Richardson/ Layton	5.1
7/19/22	Trial Prep re Anderson/ Richardson/ Layton	1.1
7/19/22	Attending Trial	7.9
7/19/22	Trial Prep during Lunch Break	0.7
7/19/22	Trial Prep re Vinger/ Tubbs	3.4
7/20/22	Attending Trial	8.2
7/20/22	Trial Prep During Lunch Break	0.8
7/20/22	Trial Prep re: Tubbs	3.9
7/21/22	Trial Prep re: Tubbs/ Hoffman	2.1
7/21/22	Attending Trial	8.9
7/21/22	Trial Prep during Lunch Break	0.6
7/21/22	Trial Prep re Closing	2.1
7/21/22	Drafting Supp Briefing on Loss of Income	1.1
7/22/22	Trial Prep re Closing	5.3
7/22/22	Attending Trial	4.3
7/22/22	Review Jury Note	0.1
7/22/22	Review Jury Note	0.1
7/22/22	Review Jur Note	0.1
7/22/22	Review Jury Note	0.1
7/22/22	Review Jury Note	0.1
7/22/22	Attending Verdict	0.5
7/22/22	Review Special Verdict Form	0.1
7/22/22	Meeting w/ Client and Tad re Verdict	0.4
8/2/22	Review Order on Mot for Judgment as Law	0.3
8/2/22	Call w/ Tad re: Order on Mot for Judgment	0.3
8/2/22	Call w/ Client re: order on Mot for Judgment	0.4
9/14/22	Review Order on Mot for Qualified Immunity	0.3
9/14/22	Call w/ Tad re: Qualified Immunity Order	0.2
9/14/22	Call w/ Client re: Qualified Immunity Order	0.3

TOTAL:**757.4**

DISCRETIONARY REDUCTION

-25

GRAND TOTAL

732.4